



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
AIR AND WASTE

June 3, 2016

Mr. Doug Gallucci
Assistant Director
EH&S Environmental Programs
University of Washington
Seattle, Washington 98195

Re: Self-Implementing On-Site Cleanup and Disposal of Polychlorinated Biphenyl (PCB) Remediation Waste at University of Washington McCarty Hall, Seattle, Washington

Dear Mr. Gallucci:

We have completed our review of the January 15, 2016, Notification and Certification (Notification), received by the EPA on February 2, 2016, in which the University of Washington requests approval of its self-implementing cleanup, verification and disposal of PCB remediation waste in accordance with the requirements of 40 C.F.R § 761.61(a). The EPA responded to the Notification with a request for more information on February 24, 2016. The UW submitted an addendum on May 11, 2016, and a response to questions in an email dated May 25, 2016.

The Notification as well as the addendum and response to questions comprise the Workplan and provide the basis for the EPA's approval of the self-implementing cleanup and disposal of PCB remediation waste pursuant to 40 C.F.R § 761.61(a). The Workplan describes the location and extent of the PCB remediation waste regulated by the Toxic Substances Control Act (TSCA), as well as remediation and disposal plans in accordance with 40 C.F.R § 761.

The PCB remediation waste is present in concrete inside transformer rooms in the North, Central and South Towers of McCarty Hall and underlying soils as a result of previous transformer leaks. The transformers were removed from the facility in the mid-1990s, however, at least some PCB remediation waste above applicable cleanup standards remained. Complete removal and disposal of PCB remediation waste is now made possible by plans to demolish McCarty Hall this summer. During demolition, contaminated concrete and underlying soils will be disposed of as PCB remediation waste.

A metal pan deck underlays a significant portion of the slab in the South Tower. This pan deck cannot be practically separated from the concrete substrate, so it will be disposed of as PCB remediation waste along with the concrete slab. During investigative activities it was not possible to sample below the pan deck. After removal of concrete with >1.0 part per million (ppm) PCBs, the underlying soil will be sampled and analyzed for PCBs. This sampling will be for the purpose of characterizing any PCB contamination within the soil, and as such, Subpart O may not be used. Characterization sampling may be conducted in accordance with Subpart N which does not allow for the use of composite samples to sample soil. Any soil with PCB concentrations >1.0 ppm will be removed and disposed as PCB remediation waste.

The UW proposes to excavate all soil and concrete contaminated with PCBs at as-found concentrations > 1.0 ppm. All material will be disposed of at Chemical Waste Management of the Northwest's Arlington, Oregon Subtitle C landfill. All disposal actions will be in accordance with 40 CFR 761.61(a)(5)(i)(B)(2)(i).

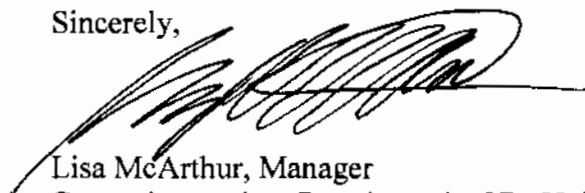
Confirmation sampling of the excavated areas will follow 40 C.F.R. 761.61(a)(6) and Subpart O as described in the Workplan and Enclosure 1. If confirmation sampling indicates PCBs are present above the cleanup level, excavation and confirmation sampling will continue until all PCBs >1.0 ppm have been removed.

Based on our review, your Notification is hereby approved, subject to the following conditions:

1. As stated in 40 C.F.R. 761.61(a), you must conduct the cleanup in accordance with all applicable requirements of 40 C.F.R. 761.61(a)(1) through (9). A copy of those requirements is enclosed for your convenience (Enclosure 1). To assist you in completing the cleanup successfully, we have placed an "X" in the margin to identify specific requirements for which your notice is deficient in describing how you plan to comply. Specific comments about each of the deficient areas are noted in bold italics following the regulatory citation. You are expected to address these deficiencies during cleanup activities and document them in your completion report.
2. You must prepare a cleanup completion summary report that describes how you conducted the cleanup in accordance with the applicable regulatory requirements, including those marked with an "X" on the enclosure. You must send a copy to Michelle Mullin, of my staff, within 120 days after disposal verification is received and final sample results validation is completed.
3. The EPA's Office of Land and Emergency Management (OLEM) policy is to evaluate cleanup actions comprehensively to ensure protection of human health and the environment and to reduce the environmental footprint of cleanup activities, to the maximum extent possible. As such, we encourage you to consider climate change and sustainability impacts during cleanups. Please see section 6 of the ASTM Standard Guide to Greener Cleanups for Best Management Practices (BMP). Many BMPs in the Guide are applicable to this cleanup. The EPA encourages you to implement any BMPs that are feasible. The cleanup completion report should include a section on BMP Documentation, as described in Section 6.6.5.

Please note that this approval does not relieve you from your duty to comply with all other applicable federal, state, and local requirements. In addition, please note that if you wish to make any changes to your notification (including changes to the project schedule), then you must submit your proposal to Michelle Mullin, of my staff, in writing no less than 14 calendar days prior to the proposed implementation of the change. If you have any questions, please contact Ms. Mullin by email at mullin.michelle@epa.gov or by telephone at (206) 553-1616.

Sincerely,



Lisa McArthur, Manager
Corrective Action, Permits and PCBs Unit

Enclosure